



Texas 9-1-1 Alliance

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February 27, 2015

Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *911 Governance and Accountability*, PS Docket No. 14-193
Improving 911 Reliability, PS Docket No. 13-75

Dear Ms. Dortch:

On Wednesday February 25, 2015, Patrick Tyler, from the Texas Commission on State Emergency Communication, and I, from the Bexar Metro 9-1-1 Network District and the Texas 9-1-1 Alliance, met with David Furth, Tim May, David Siehl, Eric Schmidt, and Brenda Villanueva from the Public Safety and Homeland Security Bureau ("PSHSB") regarding Notice of Proposed Rulemaking ("NPRM") issues in above-referenced two dockets. Specifically, it was discussed that there may be potential benefits from additional communication and collaboration between interested stakeholders to enable more detailed review and consideration of issues and potential optimal alternatives. It was further discussed that the NPRM's desired 9-1-1 transparency and 9-1-1 situational awareness may be able to be reasonably achieved without being overly cost-prohibitive or unduly burdensome.

With regard to transparency specifically, it was suggested that if more detailed documentation on network and operational deployments, including information on emergency operations planning, facility isolation recovery and notifications, etc., were to be filed with the Commission for "all areas nationwide" (hereinafter "contingency plans"), then such documentation might provide a coherent picture of relevant 9-1-1 information in a transparent manner. Updating of such "contingency plans" could potentially be coordinated with notices of material changes, similar to the type of notices of the FCC does today with local exchange company changes that may impact competitors, and voluntary participation to update such "contingency plans" approach beyond minimum transparency requirements could be potentially beneficial to all interested stakeholders. It was also discussed that such "contingency

The Texas 9-1-1 Alliance is an Administrative Agency formed pursuant to Texas Government Code 791.013 currently composed of the following Texas Emergency Communication Districts: Abilene/Taylor County 9-1-1 District, Austin County Emergency Communications District, Bexar Metro 9-1-1 Network, Brazos County Emergency Communication District, Calhoun County 9-1-1 Emergency Communication District, Cameron County Emergency Communications District, Capital Area Emergency Communications District, 9-1-1 Network of East Texas, Denco Area 9-1-1 District, Emergency Communications District of Ector County, Galveston County Emergency Communication District, Greater Harris County 9-1-1 Emergency Network, Henderson County 9-1-1 Communication District, Howard County 9-1-1 Communication District, Kerr County Emergency 9-1-1 Network, Lubbock County Emergency Communication District, McLennan County Emergency Communication District, Midland Emergency Communications District, Montgomery County Emergency Communication District, Potter-Randall County Emergency Communications District, Smith County 9-1-1 Communications District, Tarrant County 9-1-1 District, Texas Eastern 9-1-1 Network, and Wichita-Wilbarger 9-1-1 District. These districts were created pursuant to Texas Health and Safety Code Chapter 772.

plans” approach might be preferable to including within new FCC rule requirements at this time subcontractors, operating system suppliers, and/or system integrators responsible for certain functions. It was suggested that such “contingency plans” may result in the more appropriate entity or entities providing situational awareness than may otherwise be the case under the NPRM’s proposed 9-1-1 Network Operations Center approach -- because it would consider applicable individual circumstances, which can vary considerably nationwide and within states and regions.

It was pointed out that while “retail” deregulation of local exchange companies in many states may be very far along indeed, the transition to NG9-1-1 and broad incorporation of Internet Protocol (“IP”) technologies as a complete replacement for existing legacy 9-1-1 systems is still in the early stages. It was also noted that the initial areas that have transitioned to NG9-1-1 and IP technologies have usually not addressed “wholesale” FCC Local Competition Order 9-1-1 interconnection and competitive carrier issues that may be necessary to move beyond the early stage of NG9-1-1 transition. It was further pointed out that 9-1-1 service is fundamentally unique because potential material changes and modifications by applicable 9-1-1 authorities or any of the many service providers needing connection to 9-1-1 systems (e.g., local exchange companies, wireless carriers, Interconnected VoIP, third-party providers, text message providers) may potentially impact 9-1-1 call delivery and desired optimal emergency response. In some cases exempting changes or areas from something, such as providing reasonable “notice,” simply because the change may have been requested by a 9-1-1 authority or because it may not have involved more than one state simultaneously by the same company or subsidiary at the same time may not provide desired 9-1-1 transparency or 9-1-1 situational awareness. As such, it was noted again that there may be potential opportunities for more voluntarily cooperation with regard to 9-1-1 transparency and 9-1-1 situational awareness to consider.

Sincerely,



Richard Muscat
Director of Regulatory Affairs
Bexar Metro 9-1-1 Network District

Cc: David Furth, Deputy Chief, PSHSB
Tim May, Policy Analyst, PSHSB
David Siehl, Attorney Advisor, PSHSB
Eric Schmidt, Attorney Advisor, PSHSB
Brenda Villanueva, Attorney Advisor, PSHSB
Patrick Tyler, Texas Commission on State Emergency Communications